

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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March 10, 2021

**BY ECF**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Miguel Angel Martinez  
19 Cr. 681 (NRB)**

Dear Judge Buchwald:

I write, with the consent of the government, to request an adjournment of the status conference in the above referenced matter currently scheduled for March 17, 2021. Since the last request for an adjournment, the parties were able to satisfy the requisite conditions for safety valve consideration and the government has just conferred a plea offer. Additional time is now required to consider that offer and prepare for an anticipated change of plea hearing.

Therefore, I respectfully request an adjournment to a date in late April, 2020. Mr. Martinez consents to the exclusion of time under the Speedy Trial Act.


Application granted. The status conference is adjourned until April 28, 2021 at 11:00 a.m. The Court excludes time under the Speedy Trial Act through that date. See 18 U.S.C. § 3161(h)(7)(A).  
**SO ORDERED.**

Respectfully submitted,

*/s/ Amy Gallicchio*

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Cc: AUSA Emily Johnson

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: New York, New York  
March 11, 2021